

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND, et al.,

Plaintiffs,

v.

C.A. No.:

DONALD J. TRUMP, et al.,

Defendants.

DECLARATION OF MATTHEW TAIBI

Pursuant to 28 U.S.C. § 1746, I, Matthew Taibi, hereby declare as follows:

1. I am over the age of eighteen and understand the obligations of an oath.
2. I have personal knowledge of all facts stated herein or have knowledge of the matters based on my review of information and records gathered by my staff.
3. I am currently employed as the Secretary-Treasurer and Principal Officer of General Teamsters Local 251 located in East Providence, R.I.
4. I represent nearly 5,000 union members across the transportation and healthcare industries, and an additional over 1,000 members in other industries. Our members include bus drivers, truck drivers, package delivery workers, mechanics, energy infrastructure maintenance workers, healthcare workers, and other employees providing critical infrastructure support across the State of Rhode Island.
5. Over the last 11 years, I have participated in hundreds of management-labor disputes on behalf of Local 251, including negotiations involving collective bargaining agreements, grievances, strikes, lockouts, and arbitrations.
6. By contract, disputes between Local 251 and employers may be referred to mediation by the Federal Mediation and Conciliation Service (FMCS). To my knowledge, dozens of disputes have been referred to FMCS over the past 11 years. Many of those disputes were successfully mediated, preventing escalations that could have had devastating impact on critical infrastructure services throughout Rhode Island.
7. For example, a 2018 strike over two weeks by school bus drivers in Providence affected over 9,000 students and cost the city at least \$600,000 for the eleven-day walkout.

8. In 2022 to 2023, Providence school bus drivers were set to strike again if contract negotiations fell through. However, the potential crisis was averted with the assistance of mediation through FMCS.

9. Currently, four more school bus contracts are either open or are set to open in the immediate future, and another six are set to open next year, impacting almost 900 school bus workers in Rhode Island. If negotiations fall through, thousands of students in over ten school districts may not have reliable transportation to school and the cost to the employers could be significant.

10. In addition to our bus drivers, Local 251 represents 2,500 healthcare workers in Rhode Island hospitals, including at Rhode Island Hospital, the only Level 1 Trauma Center in the state. In other words, Rhode Island Hospital is the only hospital in the state which has board-certified trauma surgeons and surgical critical care teams on staff, and which has operating rooms open and staffed around the clock, able to care for all patients (pediatric and adult) in the state with acute, complex trauma and life threatening injuries (such as gunshot victims and people seriously injured in motor vehicle accidents). Failed contract negotiations would lead to massive disruptions in the state's fragile healthcare ecosystem, creating risk to and threatening the health and wellbeing of every person throughout the state. In 2015, a mediator played a crucial role in assisting negotiations to avoid a strike.


11. I submit this declaration in connection with Executive Order 14,238, "Continuing the Reduction of the Federal Bureaucracy," which directed seven federal agencies, including the Federal Mediation and Conciliation Service (FMCS), to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the

performance of any statutory functions and associate personnel to the minimum presence and function required by law.

12. In my opinion, FMCS's dispute resolution services outlined above are critical for resolving labor disputes in Rhode Island because the agency provides experienced, third-party mediators from outside the State to resolve entrenched conflicts where the State or a municipality is a party.

13. If FMCS ceased to function in a meaningful way, it is my opinion that the State and municipalities in Rhode Island would suffer from prolonged labor disputes that could disrupt transportation, healthcare, and other critical services throughout the State.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on April 3rd, 2025, at Smithfield, Rhode Island.



Matthew Taibi